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November 17, 2005

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

Re: *American Cellular Corporation*
Dobson Cellular Systems, Inc.
Supplement to Hearing Aid Compatibility Status Report #4
WT Docket No. 01-309

Dear Ms. Dortch:

American Cellular Corporation (“ACC”) and Dobson Cellular Systems, Inc. (“Dobson”),¹ by their attorney, hereby supplement the Hearing Aid Compatibility Status Report #4 that the Alliance for Telecommunications Industry Solutions (“ATIS”) is filing contemporaneously herewith on behalf of Dobson, ACC, and other members of the Incubator Solutions Program #4 (“Incubator Group”).² This supplement is provided pursuant to the Commission’s recent *Memorandum Opinion & Order* (“MO&O”), in which the Commission permitted carriers until August 1, 2006 to satisfy the requirements of Section 20.19(c)(2) of the Commission’s rules by offering dual-band GSM handsets that only satisfy the hearing aid compatibility (“HAC”) rating in the 1900 MHz band.³

As provided in the *MO&O*, the instant supplement provides notice that Dobson and ACC are availing themselves of the temporary waiver relief provided in the *MO&O*.

¹ Dobson and ACC are wholly-owned subsidiaries of Dobson Communications Corporation (“DCC”) and are the two primary entities through which DCC provides wireless services to the public.

² The joint report satisfies the reporting obligations for the members of the Incubator Group that includes Dobson and ACC. See *Public Notice*, “WTB Announces Hearing and Compatibility Reporting Dates for Wireless Carriers and Handset Manufacturers,” DA 04-630 (rel. Mar. 8, 2004).

³ 47 C.F.R. § 20.19(c)(2). Specifically, the Commission allowed for the HAC rating in the 1900 MHz band for dual-band GSM handsets to be the overall compliance rating for both the 850 MHz and 1900 MHz bands. See *Section 68.4(a) of the Commission’s Rules Governing Hearing Aid-Compatible Telephones*, WT Docket No. 01-309, *MO&O*, FCC 05-166 at ¶ 23 (rel. Sept. 8, 2005).

Marlene H. Dortch, Secretary
November 17, 2005
Page 2

Moreover, information is attached hereto on the efforts of Dobson and ACC: (i) to offer dual-band GSM handsets that achieve a rating of M3 or higher in the 850 MHz band; (ii) to ensure that consumers seeking HAC phones have a 30-day trial period or flexible return policy; and (iii) to provide consumers with current technical and anecdotal information on HAC handsets.⁴ Additional information in this regard can be found in the ATIS Hearing Aid Compatibility Status Report #4.

Should you have any questions regarding this matter, please contact Dobson's and ACC's Washington, D.C. counsel, Lawrence J. Movshin, at Wilkinson Barker Knauer, LLP, 2300 N Street, N.W., Suite 700, Washington, DC 20037, telephone number (202) 783-4141.

Sincerely,



Herbert Kenney
Associate Corporate Counsel
Dobson Communications Corporation

Enclosure

⁴ *Id.*

**American Cellular Corporation
Dobson Cellular Systems, Inc.
Status Report on Hearing Aid Compatibility**
(as of November 1, 2005)

Section 1. Company Information

<i>a. Company Name:</i> Dobson Cellular Systems, Inc. ("Dobson") & American Cellular Corporation ("ACC") ¹		<i>b. Contact Name:</i> Herbert Kenney
<i>c. Address:</i> 14201 Wireless Way		
<i>d. City:</i> Oklahoma City	<i>e. State:</i> Oklahoma	<i>f. Zip Code:</i> 73134
<i>g. Phone:</i> 405-529-8336	<i>h. Fax:</i> 405-529-8765	<i>i. Email:</i> Herbert.Kenney@Dobson.net

Section 2. Compliant Phone Model Information

a. Compliant Phone Models:

Model	Band(s)	Air Interface(s)	ANSI C63.19 Rating	FCC ID	Grant Type
Motorola V3	800/1900	GSM	M3	IHDT56EU1	Class 2 w/ Waiver
Motorola V220	800/1900	GSM	M3	IHDT56ER1	Class 2 w/ Waiver

b. Total Number of Compliant Models: 2

c. Total Number of Models (US): 13

Section 3. Product Labeling Information

Handset units shipped by manufacturer starting September 16, 2005 contain a label affixed to the unit's packaging indicating the M-rating of the phone, and an owner's manual addendum is included in the packaging that discusses the rating system. For inventory shipped prior to that date, labels and an owner's addendum were indirectly acquired from the manufacturer through a third party vendor; labels were then applied to existing inventory packaging and copies of the owner's addendum were also included in the packaging.

Section 4. Consumer Outreach Efforts

In addition to the outreach efforts undertaken by the ATIS HAC Incubator group in which Dobson and ACC are members (the "Incubator Group") that are discussed in the consolidated ATIS Hearing Aid Compatibility Status Report #4 ("Joint Report") filed contemporaneously herewith, Dobson and ACC

¹ Dobson and ACC are wholly-owned subsidiaries of Dobson Communications Corporation ("DCC") and are the two entities through which DCC provides wireless services to the public.

have instructed their sales personnel on the availability of HAC compliant phone models and have instructed sales staff to direct those looking for such phones to these models. See *a/s/o* Joint Report at Section V.B. Moreover, sales personnel have been instructed to inform hearing impaired individuals that there is a flexible return policy for HAC compliant phones, whereby the customer can cancel the service agreement and return the phone within 30 days of purchase without incurring any penalty or early termination charge if the customer is not satisfied with the handset's performance with the user's hearing aid. In addition, Dobson and ACC are in the process of (i) ensuring that consumer outreach pamphlets, titled "Get the Buzz Out," are available to consumers at all Dobson/ACC retail outlets and (ii) updating their website to provide consumers with additional information on HAC compliant phones that are offered by Dobson/ACC. The handouts provide consumers with information on the FCC's requirements and the HAC rating system. To the extent that additional information is developed by industry or the hearing impaired community on the compatibility of certain phone models with particular hearing aids, Dobson/ACC will endeavor to make such information available to consumers.

Section 5. Retail Availability of Compliant Models

The HAC compliant models identified above are available in the more than 220 retail stores that are owned and operated by Dobson/ACC. HAC models are also on-hand in each store for live in-store testing. Finally, HAC compliant phones are available on-line at Dobson/ACC's website, see <https://www.celloneusa.com/ECeIIPortal/ECeII.portal>.

Section 6. Efforts to Incorporate Hearing Aid Compatibility into New Models

Dobson and ACC are not manufacturers of handsets and lack the buying power of a national provider to influence handset design. Given the level of its purchasing needs, neither Dobson nor ACC is able to buy directly from manufacturers; rather, each company buys all of its handsets from third party vendors. Accordingly, Dobson and ACC are unable to dictate or otherwise persuade manufacturers to include certain HAC design elements in new models. However, participation in the Incubator Group does provide a forum by which Dobson/ACC along with other regional, national, and smaller service providers can provide suggestions and feedback to manufacturers as to design elements needed for the production of viable handsets that are HAC compliant. Moreover, the Incubator Group in which Dobson and ACC are voting members is working to modify the ANSI C63.19 standard to take into account the hearing aid frequency differential between the 850 MHz and 1900 MHz bands for GSM operations. See Joint Report at Sections IV and V.D.

Section 7. Activities Related to ANSI C63.19 or Other Standards

Efforts on this point undertaken by the Incubator Group, in which Dobson and ACC are voting members, are detailed in the Joint Report and are incorporated herein by reference. See Joint Report at Sections IV and V.D.

Section 8. Efforts to Test Interoperability With Hearing Aids

Nothing to report at this time.

Section 9. Information Regarding Differences in Handset Offerings Among Regions in Service Areas (Service Providers Only)

No differences in handset offerings among regions.

Section 10. Statement of Waiver and Status of Efforts Towards Compliance (Vendors or Service Providers who availed themselves of the FCC 05-166 *Memorandum Opinion and Order* released September 8, 2005)

Dobson and ACC hereby notify the Commission that they are availing themselves of the temporary relief provided in the FCC's September 8, 2005 order that allowed, until August 1, 2006, for a dual-band GSM handset's HAC rating in the 1900 MHz band to be the overall compliance rating for both the 850 MHz and 1900 MHz bands. See *Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones*, WT Docket No. 01-309, *Memorandum Opinion and Order*, FCC 05-166 at ¶ 23 (rel. Sept. 8, 2005) ("*MO&O*"). As required by the *MO&O*, Dobson/ACC has provided detailed information in Sections 2-7 above on its efforts: (i) to offer dual-band GSM handsets that achieve a rating of M3 or higher in the 850 MHz band; (ii) to ensure that consumers seeking HAC phones have a 30-day trial period or flexible return policy; and (iii) to provide consumers with current technical and anecdotal information on HAC handsets. *Id.*